IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA WILMINGTON DIVISION

In re Berg, Richard & Jennifer Debtor(s)

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

Debtor(s), by counsel, respond(s) as follows:

1. The Debtor is delinquent as stated by the Trustee but requests that the Court sets a hearing on the matter.

WHEREFORE, Debtor prays for:

- (1) An order denying the requested relief; and
- (2) That the Court schedules a hearing on this matter.

Berg, Richard & Jennifer

/s/ Steven P. Richards Steven P. Richards, Esquire

Case Number: 15-03416-5-SWH

Chapter 13

CERTIFICATE

The undersign hereby certifies under penalty of perjury that he/she is over eighteen (18) years of age and that this Response in the above captioned case was this day served upon the below named persons by either mailing, postage prepaid, first class mail, a copy of such instrument, or by serving such instrument electronically, as stated:

Richard M. Stearns Chapter 13 Trustee Via electronically

9-8-15

/s/ Steven P. Richards
Steven P. Richards, Esq. (NC BAR # 37747)
Attorney & Counselor at Law
P.O. Box 2140
Wilmington, NC 28401
910-763-3832